

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RACHEL WEINGEIST, INDIVIDUALLY
AND ON BEHALF OF ALL OTHER
PERSONS SIMILARLY SITUATED WHO
WERE EMPLOYED BY TROPIX MEDIA &
ENTERTAINMENT AND TROPIX
HOLDINGS LLC AND TROPIX INC.,

PLAINTIFF/COUNTERCLAIM
DEFENDANT,

-AGAINST-

TROPIX MEDIA & ENTERTAINMENT,
TROPIX HOLDINGS LLC, TROPIX INC.,
MARIO BAEZA, TAYMI CESPEDES,
JAVIER RODRIGUEZ, AND TANIA
MILAN,

DEFENDANTS/COUNTERCLAIM
PLAINTIFFS.

TROPIX MEDIA & ENTERTAINMENT,
TROPIX HOLDINGS LLC, TROPIX INC.
AND MARIO BAEZA,

THIRD PARTY PLAINTIFFS,

-AGAINST-

RACHEL WEINGEIST, INDIVIDUALLY,
PERERA & COMPANY LLC AND
PICKLED PUNK SUBLEASE LLC,

THIRD PARTY DEFENDANTS.

CIVIL ACTION NO.: 1:20-CV-00275-ER-SLC

**NOTICE OF MOTION TO
WITHDRAW AS COUNSEL, TO
EXTEND TIME TO SERVE
DISCOVERY DEMANDS AND TO
EXTEND TIME TO RESPOND TO
DISCOVERY DEMANDS**

SIRS:

PLEASE TAKE NOTICE that upon the attached affirmation of Geoffrey D. Mueller, Esq., sworn to on October 26, 2022, the Law Offices of Geoffrey D. Mueller, LLC will move

before this Court, Honorable Judge Edgardo Ramos, U.S.D.J., in Room 619, United States District Court for the Southern District of New York, 40 Foley Square, New York, New York, on the ____ day of _____, 2022 at 10:00 a.m., or soon thereafter as counsel can be heard, for an order permitting the Law Offices of Geoffrey D. Mueller, LLC to withdraw as counsel of record for Defendants/Counterclaim Plaintiffs/Third Party Plaintiffs, Mario Baeza, individually, Tropix Media & Entertainment, Tropix Holdings LLC and Tropix Inc, to extend time to serve discovery demands and to extend time to respond to discovery demands.

Dated: Westwood, New Jersey
October 26, 2022

Law Offices of Geoffrey D. Mueller, LLC
Attorneys for Defendants, Tropix Inc. d/b/a
Tropix Media & Entertainment, Tropix
Holdings LLC and Mario Baeza

By: /s/Geoffrey D. Mueller
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ORDER

THIS MATTER having been presented to the Court upon the application of the LAW OFFICES OF GEOFFREY D. MUELLER, LLC, attorneys for Defendants, TROPIX INC. d/b/a TROPIX MEDIA & ENTERTAINMENT, TROPIX HOLDINGS LLC and MARIO BAEZA for an

Order permitting the Law Offices of Geoffrey D. Mueller, LLC to withdraw as Counsel for Defendants, Tropix Inc. d/b/a Tropix Media & Entertainment, Tropix Holdings LLC and Mario Baeza, individually and to extend time to serve discovery demands and to extend time to respond to discovery demand in the above-referenced matter; and for good cause shown:

IT IS on this _____ day of _____, 2022;

ORDERED that the Motion to permit the Law Offices of Geoffrey D. Mueller, LLC to Withdraw as Counsel for Defendants be and is hereby GRANTED; and

IT IS FURTHER ORDERED that the Defendants Tropix Inc. d/b/a Tropix Media & Entertainment, Tropix Holdings LLC and Mario Baeza, individually are to retain successor counsel within _____ days of the date hereof; and

IT IS FURTHER ORDERED that the Defendants Tropix Inc. d/b/a Tropix Media & Entertainment, Tropix Holdings LLC and Mario Baeza, individually shall have until _____ day of _____ 2022 to respond to written discovery demands previously served on them; and

IT IS FURTHER ORDERED that the Defendants Tropix Inc. d/b/a Tropix Media & Entertainment, Tropix Holdings LLC and Mario Baeza, individually shall have until _____ day of _____ 2022 to serve written discovery demands on all other parties hereto; and

IT IS FURTHER ORDERED that within _____ days of the Law Offices of Geoffrey D. Mueller, LLC's receipt of this Order, a copy of this Order shall be served upon all parties including Tropix Inc. d/b/a Tropix Media & Entertainment, Tropix Holdings LLC and Mario Baeza, individually by electronic mail, first class mail and certified mail, RRR.

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CERTIFICATION OF SERVICE

I hereby certify that on this 26th day of October, 2022, a true and accurate copy of the Law Offices of Geoffrey D. Mueller, LLC's Motion to Withdraw as Counsel and to extend time to serve discovery demands and to extend time to respond to discovery demands was filed and served on

all counsel of record via ECF.

Dated: Westwood, New Jersey
October 26, 2022

Law Offices of Geoffrey D. Mueller, LLC
Attorneys for Defendants, Tropix Inc. d/b/a
Tropix Media & Entertainment, Tropix
Holdings LLC and Mario Baeza

By: /s/Geoffrey D. Mueller
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